

Pioneer Telephone Cooperative, Inc.

LEGAL DIVISION
P.O. Box 539
Kingfisher, OK 73750
FAX: 405-375-3900

Harold Logsdon
General Counsel
405-375-0171
hllogsdon@ptci.com

Connie Holthus
Legal Manager
405-375-0383
FAX: 405-375-6329
csholthus@ptci.com

February 4, 2008

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Re: Annual CPNI Certification and Accompanying Statement of Pioneer Telephone Cooperative, Inc.; Form 499 Filer ID: 73-0618715

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.2009(e), Pioneer Telephone Cooperative, Inc. hereby submits its CPNI Certification and Accompanying Statement. If you have any questions regarding this submission please free to contact me.

Sincerely,


Connie Holthus
Legal Manager

Enclosures

EB Docket No. 06-36

**CERTIFICATION OF CPNI FILING
PURSUANT TO 47 C.F.R. §64.2009(e)**

February 4, 2008

I certify that I am an officer of Pioneer Telephone Cooperative, Inc.; and I have personal knowledge that Pioneer Telephone Cooperative, Inc. has established operating procedures that are adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

A handwritten signature in cursive script, appearing to read "Loyd Benson", is written over a horizontal line.

Loyd Benson, Principal Executive Officer

February 4, 2008

STATEMENT OF COMPLIANCE WITH THE FCC'S CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES

Pioneer Telephone Cooperative Inc.'s operating procedures ensure that Pioneer Telephone Cooperative, Inc. is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

Pioneer Telephone Cooperative, Inc. has internal procedures in place to continually educate and train our employees about CPNI and the disclosure of CPNI. Our employees are instructed that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of Pioneer Telephone Cooperative, Inc. that is made available to us by the customer solely by virtue of our relationship with our customers; and information contained in the bills pertaining to telephone exchange service or toll service of other carriers that we bill for received by our customers; except that such term does not include subscriber list information. Our employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination.

The Company has not taken any action against data brokers during the preceding year regarding unauthorized release of CPNI; nor has the Company received any customer complaints concerning the unauthorized access to or unauthorized disclosure of CPNI. The Company has implemented safeguard procedures to protect our customers' CPNI from pretexters including, but not limited to, the adoption and implementation of a policy for customer requests for CPNI consistent with 47 C.F.R. §64.2010.

Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.

If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009, and a process ensures that opt-out elections are recorded and followed.

**PIONEER TELEPHONE COOPERATIVE, INC.
P.O. BOX 539
KINGFISHER, OKLAHOMA 73750**